

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 20-CR-1219 JB
	)	
BLAINE MORGAN,	)	
	)	
Defendant.	)	

UNOPPOSED MOTION FOR ORDER TO REMAND

Blaine Morgan, through counsel, respectfully requests that the Court order that he be remanded into custody pending sentencing. The government is not opposed to this request.

Mr. Morgan pleaded guilty to a single count of involuntary manslaughter, contrary to 18 U.S.C. §§ 1153 and 1112. The terms of the plea agreement, entered into pursuant to Rule 11(c)(1)(C), dictate that he will serve a period of incarceration of eighteen months, if the district court accepts that agreement.

At the plea hearing on May 25, 2021 the Court granted Mr. Morgan's request that he remain out of custody on the same conditions of release that applied prior to his plea, finding that those conditions were sufficient to guarantee his appearance in court and the safety of the community, pursuant to 18 U.S.C. § 3143(a)(1). However, Mr. Morgan now requests that the Court remand him to custody so that he can begin accruing time against

the sentence he expects to be imposed at the time of sentencing (on a date yet to be determined).

Counsel for the government, Assistant United States Attorney Jennifer Rozzoni, does not oppose this request.

Respectfully Submitted,

**FEDERAL PUBLIC DEFENDER**  
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*Electronically filed June 21, 2021*  
/s/ Hans Erickson  
Assistant Federal Public Defender